



cc: Daron
Beth

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DIV. OF OIL, GAS & MINING

February 11, 2008

Hand Delivered

Daron R. Haddock
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Salt Lake City, UT 84114

Dear Mr. Haddock:

RE: Letter from DOGM dated February 5, 2008, Fines Test Results

Staker & Parson Companies would like to comment on the letter received from DOGM concerning the fines testing at Beck Street. We appreciate the information you have provided to us concerning the results of the fines testing. Your concerns and suggestions have been noted and discussed, although we would like to direct you to Sections in our Beck Street Reclamation Plan that directly address the issues you have brought forward in your letter. It is important to note Staker & Parson Companies fully expected the tested fines to show no organic matter, it states this fact in the Beck Street Reclamation Plan. Please see the following Sections from the Plan:

From Section 7.2:

Pit Floor

Final surface preparation of the pit floor and seeding of the rockfall buffer area would be done following completion of mining.

Upon completion of mining and prior to reclamation, representative areas of the pit floor will be sampled for factors to determine the floor's ability to support growth. Depending upon the results of those tests, amendments will be added to the 6" deep topsoil/fines mix as necessary to provide an acceptable growth medium. For surety purposes, it is assumed that organic mulch will be incorporated to the pit floor surface material prior to seeding.

From Section 7.5:

1. Pit Floor Revegetation Plan: At the end of mining, and once the pit floor is re-graded to drain gently to east, the pit floor materials would be sampled if necessary, to determine their ability to support plant growth. Because of the nature of the pit floor, it is presumed to be adequate for growth, with the possible exception of lack of organics. The remaining stored topsoil would be combined with wash plant fines and spread over the pit floor, maintaining grade.

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The sampling of the pit floor material would be conducted from representative areas. Six grab samples of pit floor material would be taken and analyzed for factors including: texture, pH, conductivity, CEC, SAR, % organics, Total N, K, and PO4, and acid-base accounting.

Based upon the results of this sampling, one of the following is planned:

a) If The pit floor would be ripped to a depth of at least 2 feet and broadcast seeded with the below seed mix to promote site stability until development occurs.

b) In the event that sampling shows it's needed, composted manure at a rate of 5 tons/acre would be added to the pit floor to increase its effectiveness as a growth medium. The pit floor would be ripped to a depth of 1½ to 2 feet, to loosen the material and incorporate the organics. Topsoil/fines would be added to a depth of 6 inches. The surface would then be broadcast seeded with the below seed mix to promote site stability until development occurs. The soil testing and addition of composted manure and topsoil have been used in the surety estimate. Any other fertilizers or amendments determined to be necessary would be added as needed, but are not included in surety.

If you feel we have not adequately covered your findings please contact me, and a meeting can be arranged.

Sincerely,

Staker & Parson Companies



Michael Dalley
Environmental Affairs

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